

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX**

Index No.: \_\_\_\_\_/19

-----X  
**STEPHEN JIMENEZ,**

**Plaintiff designates  
BRONX COUNTY  
as place of trial.**

**Plaintiff,**

**-against -**

**The basis of venue is  
Defendants' residences in  
BRONX COUNTY**

**DIOCESE OF BROOKLYN, HOLY NAME OF JESUS  
SCHOOL, ST. JOSEPH THE WORKER CATHOLIC  
ACADEMY and HOLY NAME OF JESUS CHURCH,**

**SUMMONS**

**The Plaintiff's place of  
residence is 2575 Aquetong  
Road  
New Hope, PA 18938**

**Defendants.**

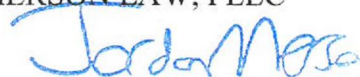
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To the above-named defendants:

**YOU ARE HEREBY SUMMONED** to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

**A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT,  
BRONX COUNTY ON \_\_\_\_\_ IN COMPLIANCE WITH CPLR §§305(a) AND  
306(a).**

Dated: New York, New York  
August 14, 2019

MERSON LAW, PLLC



By: \_\_\_\_\_

Jordan K. Merson  
Attorneys for Plaintiff  
150 East 58<sup>th</sup> Street 34<sup>th</sup> Floor  
New York, New York 10155  
(212) 603-9100

TO:

**DIOCESE OF BROOKLYN**

310 Prospect Park West

Brooklyn, NY 11215

**HOLY NAME OF JESUS SCHOOL**

241 Prospect Park West

Brooklyn, NY 11215

**ST. JOSEPH THE WORKER CATHOLIC ACADEMY**

214 Prospect Park West

Brooklyn, NY 11215

**HOLY NAME OF JESUS CHURCH**

245 Prospect Park West

Brooklyn, NY 11215

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

Index No.: \_\_\_\_\_/19

-----X  
STEPHEN JIMENEZ,Plaintiff,  
-against -**VERIFIED  
COMPLAINT**DIOCESE OF BROOKLYN, HOLY NAME OF JESUS  
SCHOOL, ST. JOSEPH THE WORKER CATHOLIC  
ACADEMY and HOLY NAME OF JESUS CHURCH,Defendants.  
-----XPlaintiff(s), above named, complaining of the defendants, by **MERSON LAW,**

PLLC., respectfully allege(s):

**NATURE OF THE CLAIM**

1. This is a case of plaintiff Stephen Jimenez who was sexually abused as a child by Brother Romanus Brocado ("Romanus") at and of Holy Name of Jesus School and/or St. Joseph the Worker Catholic Academy ( herein referred to collectively as "School"), Holy Name of Jesus Church ("Church") and Diocese of Brooklyn ("Diocese).
2. Romanus was an agent, servant and/or employee at the School which was part of the Diocese and Church. Romanus was known among the community and the children as a sexual predator, yet he was allowed unfettered access to children including on Diocese's premises.
3. Despite Romanus's reputation as a sexual predator to young children, he continued to be a brother and/or teacher under the supervision and control of the Diocese of Brooklyn, School and Church.

4. The Diocese, School and Church knew or should have known Romanus sexually abused children and/or had the propensity to sexually abuse children.
5. Beginning in or about 1963 and continuing through to 1967, Romanus, while acting under the scope of his employment with the Diocese, School and Church and on behalf of the Diocese, School and Church, sexually abused Plaintiff, between the ages of ten and fourteen, by forcibly and repeatedly fondling and/or molesting his penis, raping him, and otherwise sexually abusing him.
6. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he incurred because of the negligence of the Diocese of Brooklyn, Holy Name of Jesus School, St. Joseph the Worker Catholic Academy and Holy Name of Jesus Church and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

#### **PARTIES**

7. At all times herein mentioned defendant **DIOCESE OF BROOKLYN** a not for profit corporation incorporated in the State of New York and by virtue of the laws of the State of New York.
8. At all times herein mentioned, defendant **DIOCESE OF BROOKLYN** was located at 310 Prospect Park West, Brooklyn, New York 11215.
9. At all times herein mentioned, Romanus was a Brother operating under the direction and control of defendant **DIOCESE OF BROOKLYN**, and its agents, servants and/or employees.
10. At all times herein mentioned, Romanus was an agent, servant and/or employee of defendant **DIOCESE OF BROOKLYN**.

11. At all times herein mentioned defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** is a not for profit corporation incorporated in the State of New York and by virtue of the laws of the State of New York.
12. At all times herein mentioned, defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** located at 241 Prospect Park West, Brooklyn, NY 11215.
13. At all times herein mentioned, Romanus was a brother operating under the direction and control of defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY**, and its agents, servants and/or employees.
14. At all times herein mentioned, Romanus was an agent, servant and/or employee of defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY**.
15. At all times herein mentioned defendants **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** were agents, servants, employees and or alter-egos of each other.
16. At all times herein mentioned defendant **HOLY NAME OF JESUS CHURCH** a not for profit corporation incorporated in the State of New York and by virtue of the laws of the State of New York.
17. At all times herein mentioned, defendant **HOLY NAME OF JESUS CHURCH** was located at 245 Prospect Park West, Brooklyn, New York 11215.

18. At all times herein mentioned, Romanus was a Brother operating under the direction and control of defendant **HOLY NAME OF JESUS CHURCH** and its agents, servants and/or employees.
19. At all times herein mentioned, Romanus was an agent, servant and/or employee of defendant **HOLY NAME OF JESUS CHURCH**.
20. At all times herein mentioned, Defendants **DIOCESE OF BROOKLYN, HOLY NAME OF JESUS SCHOOL ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or **HOLY NAME OF JESUS CHURCH**, were agents, servants, employees and/or alter egos of each other.

**FACTS OF THE CASE**

21. Defendants **DIOCESE OF BROOKLYN, HOLY NAME OF JESUS SCHOOL ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or **HOLY NAME OF JESUS CHURCH'S** negligence and recklessness caused Romanus to have access to children, including on Diocese, School and Church premises, despite its knowledge that Romanus sexually abused children and/or had the propensity to do so and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **DIOCESE OF BROOKLYN, HOLY NAME OF JESUS SCHOOL ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or **HOLY NAME OF JESUS CHURCH'S** negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by Brother Romanus. Defendants **DIOCESE OF BROOKLYN, HOLY NAME OF JESUS SCHOOL ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or **HOLY NAME OF JESUS CHURCH'S** gross negligence, reckless, wanton, and/or willful conduct warrants punitive liability.

22. Romanus was a Brother and teacher at Holy Name of Jesus School which was under the direction and control of the Diocese and Holy name of Jesus Church. Holy Name of Jesus School was renamed to be St. Joseph the Worker Catholic Academy.
23. Beginning in or about 1963 and continuing through to 1967, Romanus sexually abused plaintiff repeatedly. The abuse occurred in Romanus's classroom at the School, in bathhouses, under the Coney Island Boardwalk and other venues across New York City including the Bronx.
24. Upon information and belief, Romanus sexually abused many boys in the school's locker room, at the St. George pool and other public places.
25. Romanus's sexual abuse of plaintiff and other children was open and obvious.
26. Romanus sexually abused plaintiff by fondling and molesting him and repeatedly raping him.
27. Romanus and the other staff members under the direction and control of the Diocese, School and Church manipulated him into not disclosing the sexual abuse by repeatedly being beaten with paddles, sticks, metal rulers and fists.
28. Romanus used his position of power and authority provided him by the Diocese, School and Church to be able to sexually abuse plaintiff and other boys.
29. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of defendants **DIOCESE OF BROOKLYN, HOLY NAME OF JESUS SCHOOL ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or **HOLY NAME OF JESUS CHURCH's** negligence in undertaking a duty to keep patrons, including young children, of its parishes safe from predators and failing to act in accord with that duty by allowing Brother Romanus, a known predator, to continue his role and position of authority where

he would continue to have the opportunity to prey on young children, and the Diocese, School and Church failed to adequately supervise Romanus.

**AS FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE**

**AS TO DIOCESE OF BROOKLYN**

30. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 29., inclusive, with the same force and effect as if hereinafter set forth at length.
31. At all times mentioned herein, defendant **DIOCESE OF BROOKLYN** owed a duty of care to plaintiff and to keep students of its school, safe from sexual abuse by its clergymen under its supervision and control, including on company premises, that ultimately befell the Plaintiff, including on Diocese, Church and School premises and property, and they had a duty to supervise Romanus.
32. At all times mentioned herein, defendant **DIOCESE OF BROOKLYN** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
33. As a result of the negligence of defendant **DIOCESE OF BROOKLYN** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
34. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
35. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.

36. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
37. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A SECOND CAUSE OF ACTION FOR NEGLIGENCE**

**AS TO HOLY NAME OF JESUS SCHOOL AND/OR ST. JOSEPH THE WORKER**

**CATHOLIC ACADEMY**

38. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 38., inclusive, with the same force and effect as if hereinafter set forth at length.
39. At all times mentioned herein, defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** owed a duty of care to plaintiff and to keep students of its school, safe from sexual abuse by its clergymen under its supervision and control, including on company premises, that ultimately befell the Plaintiff, including on Diocese, Church and School premises and property, and they had a duty to supervise Romanus.
40. At all times mentioned herein, defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
41. As a result of the negligence of defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress,

mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

42. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
43. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
44. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
45. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A THIRD CAUSE OF ACTION FOR NEGLIGENCE**

**AS TO HOLY NAME OF JESUS CHURCH**

46. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 45., inclusive, with the same force and effect as if hereinafter set forth at length.
47. At all times mentioned herein, defendant **HOLY NAME OF JESUS CHURCH** owed a duty of care to plaintiff and to keep students of its school, safe from sexual abuse by its clergymen under its supervision and control, including on company premises, that ultimately befell the Plaintiff, including on Diocese, Church and School premises and property, and they had a duty to supervise Romanus.
48. At all times mentioned herein, defendant **HOLY NAME OF JESUS CHURCH** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.

49. As a result of the negligence of defendant **HOLY NAME OF JESUS CHURCH** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
50. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
51. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
52. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
53. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENT HIRING,  
RETENTION AND SUPERVISION AS TO DIOCESE OF BROOKLYN**

54. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 53., inclusive, with the same force and effect as if hereinafter set forth at length.
55. Defendant **DIOCESE OF BROOKLYN**, had a duty to supervise and prevent known risks of harm to children and students in its school and/or of its parishes by its clergymen.
56. Defendant was negligent in hiring, retaining and supervising their personnel, such as Romanus, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of brothers and church officials who should have properly been supervising the brothers to ensure the safety of the children of the parishes and schools.

57. Defendant **DIOCESE OF BROOKLYN** knew or should have known Romanus sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
58. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
59. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
60. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
61. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
62. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR A FIFTH CAUSE OF ACTION FOR NEGLIGENT HIRING,**

**RETENTION AND SUPERVISION**

**AS TO HOLY NAME OF JESUS SCHOOL AND ST. JOSEPH THE WORKER**

**CATHOLIC ACADEMY**

63. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 62., inclusive, with the same force and effect as if hereinafter set forth at length.
64. Defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY**, had a duty to supervise and prevent known risks of harm to children and students in its school and/or of its parishes by its clergymen.

65. Defendant was negligent in hiring, retaining and supervising their personnel, such as Romanus, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of brothers and church and school officials who should have properly been supervising the brothers to ensure the safety of the children of the parishes and schools.
66. Defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** knew or should have known Romanus sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
67. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
68. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
69. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
70. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
71. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT HIRING,  
RETENTION AND SUPERVISION AS TO HOLY NAME OF JESUS CHURCH**

72. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 71., inclusive, with the same force and effect as if hereinafter set forth at length.
73. Defendant **HOLY NAME OF JESUS CHURCH**, had a duty to supervise and prevent known risks of harm to children and students in its school and/or of its parishes by its clergymen.
74. Defendant was negligent in hiring, retaining and supervising their personnel, such as Romanus, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of brothers and church and school officials who should have properly been supervising the brothers to ensure the safety of the children of the parishes and school.
75. Defendant **HOLY NAME OF JESUS CHURCH** knew or should have known Romanus sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
76. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
77. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
78. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.

79. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
80. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR THE SEVENTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION**  
**OF EMOTIONAL DISTRESS AS TO DIOCESE OF BROOKLYN**

81. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 80., inclusive, with the same force and effect as if herein set forth at length.
82. Defendant **DIOCESE OF BROOKLYN** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Romanus, the brother who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
83. Defendant **DIOCESE OF BROOKLYN** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
84. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Romanus.
85. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted Romanus sexually abusing Plaintiff.
86. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

87. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR THE EIGHTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION**

**OF EMOTIONAL DISTRESS**

**AS TO HOLY NAME OF JESUS SCHOOOL AND/OR ST. JOSEPH WORKER**

**CATHOLIC ACADEMY**

88. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 87., inclusive, with the same force and effect as if herein set forth at length.
89. Defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Romanus, the brother who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
90. Defendant **HOLY NAME OF JESUS SCHOOL** and/or **ST. JOSEPH THE WORKER CATHOLIC ACADEMY** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
91. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Romanus.
92. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted Romanus sexually abusing Plaintiff.

93. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

94. This action falls within exceptions to Article 16 of the C.P.L.R.

**AND AS FOR THE NINTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION OF  
EMOTIONAL DISTRESS AS TO HOLY NAME OF JESUS CHURCH**

95. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 94., inclusive, with the same force and effect as if herein set forth at length.

96. Defendant **HOLY NAME OF JESUS CHURCH** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Romanus, the brother who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.

97. Defendant **HOLY NAME OF JESUS CHURCH** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.

98. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Romanus.

99. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted Romanus sexually abusing Plaintiff.

100. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

101. This action falls within exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiff demands judgement against defendant in such sum as a jury would find fair, adequate and just.

Dated: New York, New York  
August 14, 2019

MERSON LAW, PLLC

By:



Jordan K. Merson

Sarah R. Cantos

Attorney for Plaintiffs

150 East 58<sup>th</sup> Street 34<sup>th</sup> Floor

New York, New York 10155

(212) 603-9100

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX****Index No.:**

\_\_\_\_\_/19

-----X  
**STEPHEN JIMENEZ,****Plaintiff,****-against -****ATTORNEY  
VERIFICATION****DIOCESE OF BROOKLYN, HOLY NAME OF JESUS  
SCHOOL, ST. JOSEPH THE WORKER CATHOLIC  
ACADEMY and HOLY NAME OF JESUS CHURCH,****Defendants.**-----X  
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York State, and a member of the firm MERSON LAW, PLLC., attorneys for the plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in the file.

That the reason this verification is made by affirm ant and not by the plaintiff is that the plaintiff is not within the County where the attorney has his office.

Dated: New York, New York  
August 14, 2019

  
JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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STEPHEN JIMENEZ,

*Plaintiff (s),*

*- against -*

DIOCESE OF BROOKLYN, HOLY NAME OF JESUS  
SCHOOL, ST. JOSEPH THE WORKER CATHOLIC  
ACADEMY and HOLY NAME OF JESUS CHURCH,

*Defendant(s),*

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SUMMONS AND VERIFIED COMPLAINT

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Merson Law, PLLC.

*Attorneys for Plaintiff(s)*

*Office and Post Office Address, Telephone*  
150 East 58<sup>th</sup> Street 34<sup>th</sup> Fl.  
New York, New York 10155  
(212) 603-9100

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To: All Parties

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